

UNITED STATES OF AMERICA	)	
	)	
v.	)	NO. 3:25-cr-00115
	)	
	)	JUDGE CRENSHAW
	)	JUDGE HOLMES
KILMAR ARMANDO ABREGO GARCIA	)	

The United States of America, by and through Robert E. McGuire, Acting United States Attorney, and makes the following response to the Defendant's Motion to Amend Release Conditions (DE # 106).<sup>1</sup> The United States has steadfastly objected to the Defendant's release from custody citing his danger to the community and the risk of flight. By making the following response, the United States, to be clear, is not now abandoning that position.

<sup>1</sup> The United States is aware that the Court ordered the defense to respond on behalf of the Government regarding the Government's position if the Government did not oppose and only ordered the Government to respond if there was opposition to the Defendant's Motion. However, undersigned counsel believed it was important to file the Government's position on the record even though the Government is not opposing the Defendant's Motion to Amend. Undersigned counsel has conferred with the defense and with Pre-trial services as ordered and hopes that the Court will accept this filing in lieu of the defense filing since it accomplishes the same end: to alert the Court that the Government does not oppose the Motion.

Similarly, the United States does not oppose, and would not oppose, the Defendant having access to his attorneys to prepare for trial should he be taken into immigration custody by the Department of Homeland Security at a future point. The United States has an obvious and significant interest in providing the Defendant sufficient access to counsel in order to secure a fair trial for both parties in this case. However, the United States would note that, should the Defendant be removed from the United States to another country via deportation, the United States would no longer be in a position to facilitate the Defendant's access to his attorneys at that point.

Respectfully Submitted,

/s/ Robert E. McGuire  
Robert E. McGuire  
Acting United States Attorney  
719 Church Street, Suite 3300  
Nashville, TN 37203

/s/ Jacob Warren  
Jacob Warren  
Co-Director, Task Force Vulcan

/s/ Christopher Eason  
Christopher Eason  
Co-Director, Task Force Vulcan

/s/ Jeremy Franker  
Jeremy Franker  
Deputy Director, Task Force Vulcan

/s/ Jason Harley  
Jason Harley  
Task Force Vulcan